

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

In Re: Karla R Conroy : Case No: 17-52769  
Debtor(s) : Chapter 13 Judge: C KATHRYN PRESTON  
: Filed 6/29/17 Amended plan

**CHAPTER 13 TRUSTEE'S OBJECTION TO CONFIRMATION**

Now comes Frank M. Pees, Standing Chapter 13 Trustee, and objects to the confirmation of the plan and requests that the Court enter an Order denying confirmation for the reasons set forth below and dismissing the case, pursuant to 11 U.S.C. §1307. This objection supersedes any prior objection filed in this case by the Trustee.

Above median income \_\_\_\_\_ Below median income  X

X  **11 U.S.C. §1325(a)(1)**-Plan does not comply with all provisions of Chapter 13 of Title 11 and the other applicable provisions of Title 11:

X  Trustee is unable to accurately determine length. **An Order has not been entered on Debtor's Motion to Avoid Liens related to the R/E at 3044 Olive St as proposed by paragraph 5.4.1 of Debtor's plan.**

X  Other: **Trustee calculates IRS lien to be partially secured to \$622.89 and State of OH to be unsecured. (Note: State of OH POC filed with \$0 secured - plan provides as a secured creditor).**

X  **11 U.S.C. §1325(a)(6)**-Plan is not feasible based on income, living expenses, and plan payments. **Sch J and business income/expense stmt do not provide for Self employment tax.**

X  Other: **Plan pymts are not sufficient to cover Trustee fee, Atty fee, increased mtg conduit per poc and all other secured pymts.**

X  **11 U.S.C. §1325(b)**-Plan does not meet disposable income test. **Per 341 testimony, the R/E insurance is escrowed; however, Sch J provides for a budget item.**

Pursuant to LBR 3015-2(a), amendments necessary to place the plan in a posture for confirmation must be filed at least ten (10) days prior to the hearing on confirmation set for August 03, 2017, unless Debtor(s) have entered into an Agreed Order with the Trustee and so are bound by the terms of that Order.

Therefore, the Trustee prays that confirmation is denied and this case be dismissed for cause pursuant to §1307(c).

**TERMS OF THE PLAN:**

**Plan Payments: 869.67 - 2 mos; 873 mo - 10 mos; 1200 mo - rem**

**Best Interest Dividend: 0%     Dividend: 1%**

**Length: 0 Months**

Dated: July 07, 2017

Respectfully submitted,

/s/ Frank M. Pees

Frank M. Pees  
Chapter 13 Trustee  
130 East Wilson Bridge Road #200  
Worthington, Ohio 43085  
(614) 436-6700  
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CERTIFICATE OF SERVICE

The undersigned hereby certified that on the date shown below a copy of the Trustee's Objection to Confirmation was served electronically on the Office of the United States Trustee and Debtor's attorney, and on the Debtor(s) at the address as currently shown in the Trustee's records by regular first class mail, postage prepaid.

Dated: July 07, 2017

/s/ Frank M. Pees

Frank M. Pees

Chapter 13 Trustee

130 East Wilson Bridge Road #200

Worthington, Ohio 43085-6300